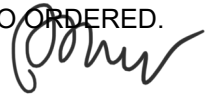


JAMES E. B	<p>Application granted in part. The motion to reopen this action is granted as unopposed. To the extent plaintiffs seek to reopen discovery, that request is denied. The time to meet and confer and file the pretrial submissions and revised pretrial submissions as set forth in, and in accordance with, the Court's May 2, 2022 Order (see Docs. 157, 190), is extended from January 27, 2023 to March 24, 2023. A pretrial conference is scheduled for April 6, 2023 at 2:30 p.m. in Courtroom 520 of the White Plains courthouse. The Clerk of Court is respectfully requested to reopen this action.</p> <p>SO ORDERED.</p>  <p>Philip M. Halpern United States District Judge</p> <p>Dated: White Plains, New York January 11, 2023</p>
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BY ECF

Honorable Philip Halpern
Southern District of New York
300 Quarropas St.
White Plains, NY 10601

Re. ***Rance, et al v. Jefferson Village Condominium No. 5, et al***
18cv6923 (NSR)(JCM)

Dear Judge Halpern:

Plaintiffs seek leave to restore the action and an extension of time to file pretrial submissions. Defendants consent to the requests.

On December 30, 2022, the Court granted an extension of time to reopen and file a Stipulation of Settlement, and Ordered the parties to file pretrial submissions by January 27, 2023.

Upon reopening the case, Plaintiffs need to depose a new corporate witness for Defendant Jefferson Village Condominium No. 5 (JVC). Defendants' counsel, Eric Sauter, has stated that it is his understanding and he is verifying that the original corporate witness is no longer available because of health reasons. The corporate witness of Defendant McGrath Management Services, Inc. may also be unavailable because he was experiencing health problems. Defendants are currently verifying if they need to designate new corporate witnesses.

In regard to the pretrial submissions, I respectfully request a 90-day extension of time to April 27, 2023, to meet and confer and file the pretrial submissions. From January 12, 2023 through February 13, 2023, I have 11 depositions scheduled. Consequently, because I need to devote substantial time to prepare the pretrial submissions, I respectfully request a short extension of time to file the pretrial submissions.

I thank the Court for its time and consideration of this request.

**Law Office of
James E. Bahamonde, P.C.**

January 10, 2023
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Respectfully,

/s/ James E. Bahamonde

James E. Bahamonde, Esq.

cc:

Eric J Sauter, Esq.

James Marshall, Esq.

Wilson Elser, Moskowitz, Edelman & Decker, LLP
Attorneys for Defendants